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October 19, 2016

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Randell H. Iwasaki, Executive Director OCCODE: 13, 2010

Steve Heminger Executive Director

**Metropolitan Transportation Commission** 

375 Beale St, Suite 800

San Francisco, California 94105

**Bradford Paul** 

**Deputy Executive Director** 

**Association of Bay Area Governments** 

375 Beale St, Suite 700

San Francisco, California 94105

Subject: CCTA Comments on the Plan Bay Area 2040 Draft Preferred Scenario

Dear Mr. Heminger and Mr. Paul:

The Contra Costa Transportation Authority (CCTA) appreciates the effort the regional agencies have expended in order to develop the draft Preferred Scenario for Plan Bay Area 2040 – the Bay Region's Regional Transportation Plan for 2017. MTC staff members Ken Kirkey and Matt Maloney provided the Contra Costa Planning Directors with a thorough presentation outlining the Draft Preferred Scenario at their September 14<sup>th</sup> meeting. Some initial comments were communicated to staff at the meeting, however, the following is an exhaustive list of our comments on the draft. The majority of our comments will focus on the land use allocations published in the August 30<sup>th</sup>, 2016 memo from MTC/ABAG.

## Land Use Forecasts

Our primary concern with the allocation of households and jobs in Contra Costa is the exacerbation of our county being primarily a producer of housing, with residents having to commute elsewhere for employment. The draft Preferred Scenario forecasts an increase of over 115,000 new households in Contra Costa over the life of the Plan (through 2040), an increase of 26,500 (23%) over the 2013 RTP forecast of nearly 89,000 new households. At the same time, job growth is forecast to grow by 112,500, a 9% reduction from the 2013 RTP forecast of nearly 122,500 new jobs.

This is concerning because Contra Costa residents already have the longest commutes in the Bay Area (Source: MTC Vital Signs), and under the draft Preferred Scenario, this will only worsen as residents attempt to

2999 Oak Road Suite 100 Walnut Creek CA 94597 PHONE: 925.256.4700 FAX: 925.256.4701 www.ccta.net access living wage jobs located further and further from their homes. East Contra Costa, home to three of the top five longest commute cities in the region, will grow by 34,500 households through 2040, with jobs increasing by only 16,000 new jobs in that timeframe, a divide that will drive East County's workers-per-job ratio from 2.4 in 2040 under the 2013 RTP to 2.5 in the draft Preferred Scenario. Although Contra Costa has invested significant local dollars into the expansion of transportation alternatives in East County, including the widening of SR-4 and extension of eBART to Antioch, these investments will struggle to keep up with the thousands of commuters who will need to travel outside the area for work.

- Similar to the above comment, we are concerned with the continued growth in housing and reduced job forecasts in Solano County, our neighbor to the north. The draft Preferred Scenario projects a slight increase in the number of households from the 2013 RTP, while the number of jobs is reduced by over 21,000. As the majority of high-paying jobs will most likely be located to the south, we expect most of those new vehicle trips to cross the Carquinez and Benicia-Martinez Bridges seeking employment in Contra Costa, and to the major job centers beyond in San Francisco, Oakland and Silicon Valley, all further adding to the traffic woes in Contra Costa. We question whether MTC has fully considered the impact that tens of thousands of new employed residents in Contra Costa, Solano, and Sonoma will have on the transportation system when the jobs they must commute to are in the big cites. Contra Costa will have to bear the brunt of the increased demand on our regional routes as a result of the increased number of households and reduction in jobs that will exacerbate the existing commute issues we already grapple with, and could work against our efforts to address greenhouse gas emissions reductions.
- There is a statement in the August 30<sup>th</sup> memo under the 'Moving Forward' heading that refers to "...the process of refining the Bay Area's ideal development pattern...". These words suggest that MTC has happened upon the quintessential land use development pattern that will solve our transportation problems. We contend that perpetuating

the tried-and-failed policy of putting housing far away from huge job centers is less than "ideal". The residents of Contra Costa, who will endure even longer, more congested commutes under the Preferred Scenario, would consider "ideal" to mean more jobs closer to existing and planned homes. Lessons learned over the past 40 years have proven again and again that creating larger "bedroom communities" as proposed in the Preferred Scenario only makes for more stress and strain on I-80, I-680, I-580, SR 4 & 24, the bridges, and BART. Moreover, these facilities are already maxed out with zero vacant capacity to absorb additional demand, and no plans for future capacity expansion.

- We are thankful that the 'No Project' alternative assumption to expand
  Contra Costa's existing urban growth boundaries, has been removed
  under the draft Preferred Scenario. While urban growth boundaries in
  other counties may be more fluid, Contra Costa's voter-approved Urban
  Limit Line under the County's Measure L, and the Authority's Measure J
  Growth Management Program (GMP) are much more difficult to re-draw
  due to the rigid GMP requirements that make their future expansion
  highly unlikely.
- We believe that the establishment and inclusion in the Plan of the Priority Production Areas program (formerly Priority Industrial Areas) in the RTP is extremely vital for preserving the Bay Area's industrial and manufacturing sectors, which produce valuable middle-income jobs in areas closer to existing housing. For Contra Costa, living-wage job production is just as important as housing production. Nearly 55 miles of Bay shoreline from Hercules to Oakley has been the focus of Contra Costa County as part of the Northern Waterfront Initiative. This effort would seek to capitalize on the bayside geography of the waterfront, and stimulate the economy by expanding the existing industrial, maritime, and manufacturing uses and providing incentives for additional development of this unique area. The County is anticipating significant job growth in the six cities and unincorporated areas, and this vision is not reflected in the Preferred Scenario. Realizing the economic potential of the Northern Waterfront could be aided by the Priority Production Area program and associated grants, as we have seen with the OBAG

program for Priority Development Area under the last two RTPs. We would also suggest the program be re-branded as "Manufacturing Activity Zones", or something similar that would more accurately reflect the variety of enterprises that might locate there.

 We also have noticed some anomalies in the draft Preferred Scenario forecasts (from the August 30<sup>th</sup> memo) which we hope can be clarified during the development of the Plan. These will be transmitted to your staff under separate cover.

## **Transportation Improvements**

We have been working very closely with MTC staff on the 2017 Call for Projects and subsequent large project performance assessment and compelling case process. The process has been challenging, but ultimately, the Authority is pleased with the project list and found that all of our priority projects were included. We appreciate the attention to detail and willingness of staff to work closely with us on the effort.

Thank you for this opportunity to comment on the Draft Plan Bay Area. CCTA looks forward to working collaboratively with MTC and ABAG as the Preferred Scenario is developed and adopted in 2017.

Sincerely,

Randell H. Iwasaki Executive Director

cc: Bay Area CMA Directors Ken Kirkey, MTC Miriam Chion, ABAG

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